

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 20-113 (DSD/BRT)

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE A. FELAN, JR.,

Defendant.

**GOVERNMENT’S MOTION FOR  
LEAVE TO FILE AN OUT OF TIME  
RESPONSE**

The United States of America, by and through its attorneys, W. Anders Folk, Acting United States Attorney for the District of Minnesota, and Melinda Williams and Emily Polachek, Assistant United States Attorneys, respectfully submits the following motion requesting leave to file out of time its response to Defendant Jose Felan’s pretrial motions (ECF Nos. 60–66). The Government’s response to Defendant’s motions were due on Monday, June 14, 2021. Both of the undersigned attorneys, however, were in trial the preceding two weeks. The Government is simultaneously filing this motion and its response, and therefore requests a one-week extension of the deadline for filing the response. Given that the parties’ motions hearing had not been scheduled to occur until August 18, 2021, this delay will not prejudice Defendant. Moreover, counsel for Defendant informed the Government that Defendant does not object to this extension. As such, the Government respectfully requests that the Court grant the Government a one-week extension of the deadline for filing its response to Defendant’s pretrial motions.

Dated: June 21, 2021

Respectfully submitted,

W. ANDERS FOLK  
Acting United States Attorney

/s/ *Emily Polachek*

BY: MELINDA WILLIAMS  
EMILY POLACHEK  
Assistant United States Attorneys